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6 Plaintiff in Pro Per

7 UNITED STATES DISTRICT COURT
8
9 CENTRAL DISTRICT OF CALIFORNIA

10 MARC WOLSTENHOLME,

11 Plaintiff,

12 vs.

13 RIOT GAMES, INC.,

14 Defendant

CASE NO. 2:25-CV-00053-FMO-BFM

HON. FERNANDO M. OLGUIN

PLAINTIFF'S RULE 26(F) DISCOVERY
PLAN

Dated this: 05 FEBRUARY 2025

17 *M. WOLSTENHOLME*

18 [MARC WOLSTENHOLME]

1 **PLAINTIFF’S RULE 26(f) DISCOVERY PLAN**

2
3 **I. Introduction**

4 Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure, Plaintiff Marc
5 Wolstenholme submits this proposed Discovery Plan in anticipation of the Rule 26(f) Conference
6 scheduled for February 13, 2025. This document outlines the scope, timing, and subject matter of
7 discovery necessary for this case.
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9
10 Plaintiff has already submitted pre-litigation discovery requests and now seeks
11 formal compliance from Defendant Riot Games, Inc.
12

13
14 **II. Initial Disclosures (Rule 26(a))**

15 Plaintiff requests that both parties exchange initial disclosures no later than
16 February 20, 2025, including:
17

18
19 A complete list of individuals likely to have discoverable information relevant to
20 the case.

21 A full list of documents, electronically stored information (ESI), and tangible
22 things that may be used to support or defend the claims.
23

24 A comprehensive damages computation, along with supporting evidence.

25 Any insurance agreements relevant to potential judgments or settlements.
26

1 Defendant Riot Games, Inc. must provide its initial disclosures as required under
2 Rule 26(a)(1) without delay.

3
4 **III. Scope of Discovery**

5 Plaintiff seeks full discovery of the following:

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7
8 **A. Development and Production of Arcane**

9 Complete timeline & documentation related to the development of Arcane from
10 inception to release.

11 Board meeting minutes approving Arcane's production and budget.

12 All internal communications discussing the concept, scriptwriting, and adaptation
13 process.

14 Drafts, storyboards, design documents, and concept art leading to Arcane's final
15 form.

16 All Riot Games internal memos, Slack messages, or emails discussing Arcane.

17
18
19 **B. Copyright and Ownership Evidence**

20 Complete list of all Riot Forge submissions, including Plaintiff's Bloodborg
21 submissions (April 15 & 19, 2020).

22 Records of Riot Games' internal discussions about adapting submissions received
23 through Riot Forge.

1 Metadata & logs showing which Riot employees accessed or reviewed Plaintiff's
2 work.

3 Contracts and agreements with external writers, agencies, or consultants involved
4 in Arcane.
5

6 C. Involvement of Talent Agencies & External Parties

7 All communications between Riot Games & external agencies (Curtis Brown
8 Group, UTA, Netflix, etc.).

9 Complete list of Arcane voice actors, including agency representation, casting
10 decisions, and contracts.
11

12 Financial records & payments to talent agencies, including receipts.

13 NDAs signed by cast members regarding Arcane's storyline and production
14 details.
15

16 D. Digital Evidence & Metadata Requests

17 Full record of email addresses & devices (including metadata logs) used to access
18 or edit Arcane-related files.

19 Internal Riot Games server logs related to Arcane's development.

20 Project folders, drafts, & notes pinned in Riot Games HQ & Fortiche writing
21 rooms.
22

23 E. Financial & Tax Information

24 Full production budget & financial breakdown for Arcane.

25 Records of tax breaks, subsidies, or external investments related to Arcane.

26 Riot Games employee NDAs, contracts, & agreements for the Arcane project.
27

Itemized list of expenditures tied to talent recruitment & agency involvement.

F. Pre-Litigation Conduct & Bad Faith Actions

Internal Riot Games communications discussing Plaintiff's claims or legal strategy.

Documents showing Riot's refusal to engage in good faith pre-litigation discovery.

Copies of communications threatening dismissal of the case instead of engaging with claims.

Internal Riot Games legal discussions on suppressing evidence or frustrating Plaintiff's legal efforts.

G. Harassment, Hate Mail, & Workplace Culture

Reports or internal investigations into hate mail received by Plaintiff.

All Riot Games internal discussions about harassment, toxicity, or cultural issues related to Arcane's production.

IV. ESI (Electronically Stored Information) Protocol

All discovery materials must be produced electronically in native format where possible.

1 Metadata must be preserved and disclosed, including timestamps, document
2 revisions, and sender/recipient data.

3 Riot Games must produce Slack messages, emails, and other internal
4 communications without redactions unless privileged.
5

6 If Riot Games claims privilege over any documents, a privilege log must be
7 provided, detailing:

8 The basis for the privilege claim.

9 A description of the document withheld.

10 The individuals involved.
11
12

13 **V. Discovery Deadlines & Schedule**

14 Discovery Event	Proposed Deadline
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15 Exchange of Initial Disclosures	February 20, 2025
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16 Completion of Written Discovery	May 1, 2025
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17 Completion of Document Production	June 15, 2025
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18 Completion of Depositions	July 15, 2025
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19 Expert Discovery Cutoff	August 1, 2025
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20 Close of Fact Discovery	August 15, 2025
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21 Dispositive Motions Due	September 1, 2025
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22 Pretrial Conference	October 2025
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23 Plaintiff proposes a six-month discovery period, allowing for additional time if
24 Defendant delays production.
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1 **VI. Anticipated Discovery Disputes and Self notes**

2 Plaintiff anticipates the following potential discovery disputes:

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4 Riot Games may refuse to produce internal communications & metadata.

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7 **Solution:** Motion to Compel (FRCP 37).

8
9 Riot Games may attempt to limit financial discovery.

10
11
12 **Solution:** Requesting full revenue breakdown under damages assessment.

13
14 Riot Games may claim privilege over key documents.

15
16 **Solution:** Demand a privilege log & seek in-camera review if necessary.

17
18
19 Delays in witness availability.

20
21 **Solution:** Request court assistance in securing depositions.

1 **VII. Protective Order & Confidentiality Agreements**

2
3 If Riot Games seeks a protective order, Plaintiff requests that:

4
5 Documents must not be marked confidential unless necessary.

6
7 Plaintiff retains the right to challenge confidentiality designations.

8
9 Confidentiality must not prevent key discovery disclosures.

10
11
12 **VIII. Conclusion**

13 This Discovery Plan ensures that Plaintiff obtains all necessary evidence to prove:

14 Copyright infringement.

15 Financial damages.

16 Riot Games' internal knowledge & misconduct.

17 Wider industry concerns.

18
19 The Plaintiff seeks a respond, comply, amend or refuse answer on every point of
20 his checklist and other outstanding discovery questions.

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22
23 Plaintiff reserves the right to modify this Discovery Plan based on new
24 information or discovery disputes.

1 The Plaintiff, Marc Wolstenholme, M.W. Wolf.

2 Date: February 5, 2025

3 Signed: *M. WOLSTENHOLME.*
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